

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF OHIO

In the Matter of the Search of)	Case No. 2:24-mj-8
USPS PRIORITY MAIL EXPRESS PARCEL)	UNDER SEAL
EI501122675US)	

I, J. Michael McClelland, Postal Inspector with The United States Postal Inspection Service, being duly sworn, depose and say:

INTRODUCTION

1. I make this affidavit in support of an application under Rule 41 of the Federal Rules of Criminal Procedure for a warrant to search the United States Postal Service Priority Mail Express parcel bearing tracking number EI501122675US (SUBJECT PARCEL). The SUBJECT PARCEL is currently located in the Southern District of Ohio, Eastern Division.

1. I am a U.S. Postal Inspector with the U.S. Postal Inspection Service (“USPIS”), stationed in Columbus, Ohio, and have been since March 2015. My responsibilities include investigating money laundering, financial crimes, identity theft, mail theft, mail fraud, bank fraud, intellectual property fraud, prohibited mailings, dangerous mail, and other violations with a nexus to the U.S. Postal Service. Prior to becoming a U.S. Postal Inspector, I was a Special Agent with the U.S. Secret Service from December 2002 through March 2015. My responsibilities as a Special Agent included investigating financial crimes, identity theft, counterfeit currency, bank fraud, wire fraud, access device fraud, and threats against the President and Vice President of the United States. I have received initial and follow-up law enforcement training throughout my career as a U.S. Postal Inspector and U.S. Secret Service Agent. This training included the seizure and examination of electronic devices in connection with federal investigations.

2. Experience and money laundering intelligence have demonstrated that Priority Mail and Priority Mail Express are commonly used to transport money orders and fraudulently obtained proceeds because of their reliability and the time pressures they place on law enforcement agents to execute a successful controlled delivery.

3. The facts set forth in this affidavit are based on my personal knowledge, knowledge obtained during my participation in this investigation, knowledge obtained from other individuals, review of records related to this investigation, communications with others who have personal knowledge of the events and circumstances described herein, and information gained through my training and experience. Because this affidavit is submitted for the limited purpose of establishing probable cause in support of the application for a search warrant, this affidavit does not set forth each and every fact learned by me during the course of this investigation.

SUBJECT PARCEL

4. On or about December 6, 2023, USPIS personnel in Los Angeles, CA intercepted the SUBJECT PARCEL upon arrival at the United States Postal Service (USPS) San Gabriel Post Office, San Gabriel, CA. The SUBJECT PARCEL is addressed to “Yanwei Dong, 402 S San Gabriel Blvd., Apt 8, San Gabriel, CA 91776”, with a return address of “Melody Liu, 501 N Henry SE, Madison, WI 53703”. The SUBJECT PARCEL is a USPS Priority Mail Express Flat Rate Envelope measuring approximately 12.5” x 9.5” and weighing approximately 4 ounces. The SUBJECT PARCEL was mailed from the USPS Wauwatosa Post Office, 1655 N Mayfair Road, Milwaukee, WI 53226 on or about November 29, 2023. The \$28.75 in US postage affixed to the SUBJECT PARCEL was paid for in cash. Below is a picture of the SUBJECT PARCEL.

PROBABLE CAUSE

5. This investigation centers on a scheme to defraud the victim out of money through use of deceptive phone calls. As explained below, receipts for U.S. Postal Money Orders were recovered from the vehicle, along with receipts for U.S. Priority Mail Express parcels, to include a receipt for the above pictured parcel, which indicates money laundering using the U.S. Mail.

6. On or about November 30, 2023, victim G.H. reported to the Knox County Sheriff's Office that a pop-up appeared on G.H.'s computer stating that the computer had been hacked and now has a virus. In addition, a phone number was displayed on the computer screen.

7. G.H. contacted the phone number that was displayed on the computer screen and was told by an unknown individual that G.H.'s computer has been hacked. The unknown individual discussed computer programs with G.H. and then asked G.H. to input bank account information. The unknown

individual then attempted to get G.H. to open a bank account. The unknown individual then asked G.H. to provide the name of the bank that G.H. has an account with. G.H. was provided with another phone number to contact regarding the supposed computer hack and virus.

8. G.H. contacted the provided phone number and spoke to an individual claiming to be John Harper from G.H.'s local bank. G.H. was then instructed to contact another phone number.

9. G.H. contacted the provided phone number and spoke to an individual claiming to be an associate of the Social Security Administration (SSA). The purported SSA associate informed G.H. that the FBI is now involved and there are illegal images on G.H.'s computer. The SSA associate told G.H. that \$30,000 needed to be paid to resolve the issue on the computer. G.H. was instructed to withdraw \$30,000 and place it in a box. G.H. was told that an FBI agent would come to G.H.'s residence on December 1, 2023, between the hours of 8:30-9:30AM to retrieve the box of money.

10. On or about December 1, 2023, G.H. received a phone call from one of the unknown individuals that G.H. spoke to on November 30, 2023. The unknown individual advised G.H. that the FBI agent is enroute to G.H.'s residence to pick up the money. The unknown individual advised G.H. to go outside and hand the box to the FBI agent and say the code word "Blue". The unknown individual advised G.H. he would place the call on hold and that he needed to contact the FBI agent to get her location.

11. Knox County Sheriff deputies were present at G.H.'s residence at the time of the call and advised G.H. to place the box on the vehicle parked in G.H.'s driveway. The unknown individual returned to the call and advised G.H. that the FBI agent was a female and that she would be wearing a sweater, with black and white pants that had flowers on them. The unknown individual again advised G.H. to go outside and hand the box to the FBI agent. G.H. advised that the box was placed on the vehicle in G.H.'s driveway and could be picked up by the FBI agent.

12. Later on or about December 1, 2023, a female fitting the above description arrived at G.H.'s residence and stood in the driveway approximately 10 feet from the front door of G.H.'s residence.

Knox County Sheriff deputies observed the female on a cell phone in G.H.'s driveway. The female then began to walk away from the residence when Knox County Sheriff deputies detained her. The female was identified as Huan Liu.

13. Continuing this date, Knox County Sheriff deputies observed a Hyundai Palisade bearing a Wisconsin license plate ASZ7758, parked with its hazard lights flashing near G.H.'s residence. The occupants of the vehicle were identified as Zhuxian Min and Jingchen Li. The above vehicle is registered to Min. Min told Knox County Sheriff deputies that he was giving Lui a ride. Min gave Knox County Sheriff deputies consent to search the vehicle. During the consent search of the vehicle Knox County Sheriff deputies found three (3) Apple iPhones, one (1) Apple laptop computer, electric money counter, ledger that contained addresses with money amounts written next to the addresses, personal items, money bands, USPS mail receipts, USPS money order receipts, identification documents, dash camera and \$86,537 US currency. The USPS mail receipts that were recovered included a receipt for the SUBJECT PARCEL. The Knox County Sheriff's Office then made contact with the Knox County Prosecutor's Office. The Knox County Prosecutor's Office advised that all three subject be placed under arrest and the vehicle be impounded. Below is a scanned picture of the receipt recovered from the vehicle related to the SUBJECT PARCEL.

UNITED STATES POSTAL SERVICE.

WAUKESHA
1655 N MAYFAIR RD
MILWAUKEE, WI 53226-3018
(800)275-8777

11/29/2023 04:39 PM

Product	Qty	Unit Price	Price
PM Express 1-Day	1		\$28.75
Flat Rate Env San Gabriel, CA 91776			
Flat Rate Signature Mailer Scheduled Delivery Date Thu 11/30/2023 06:00 PM Money Back Guarantee Tracking # E1501122675US			
Insurance			\$0.00
Up to \$100.00 included			
Total			\$28.75
Grand Total:			\$28.75
Cash			\$50.75
Change			\$22.00

In a hurry? Self-service kiosks offer quick and easy check-out. Any Retail Associate can show you how.


Save this receipt as evidence of insurance. For information on filing an insurance claim go to <https://www.usps.com/help/claims.htm> or call 1-800-222-1811.

Text your tracking number to 28777 (2USPS) to get the latest status. Standard Message and Data rates may apply. You may also visit www.usps.com USPS Tracking or call 1-800-222-1811.

Preview your Mail
Track your Packages
Sign up for FREE @
<https://informeddelivery.usps.com>

All sales final on stamps and postage.
Refunds for guaranteed services only.
Thank you for your business.

Tell us about your experience.
Go to: <https://postalexperience.com/Pos>
or scan this code with your mobile device.



or call 1-800-410-7420.

UFN: 558715-0226
Receipt #: 840-55300239-1-10727585-2
Client: 05

14. Regarding the above mentioned receipts for USPS Money Orders that were recovered from the vehicle occupied by Min, Li and Liu, there were thirty-four USPS Money Order receipts recovered from the vehicle. The value of the USPS Money Order receipts ranged from \$500 - \$1,000 each. The total amount of USPS Money Order receipts was approximately \$30,400. These USPS Money Orders were purchased at various US Post Offices and the amounts were kept under \$3,000.

15. On December 6, 2023, USPIS Inspectors intercepted the SUBJECT PARCEL in Los Angeles, CA. USPIS confirmed through database searches that an individual with the same

name as the recipient on the parcel, Yanwei Dong resided at the recipient address, 402 S San Gabriel Blvd., Apt 8, San Gabriel, CA 91776. Due to a potential language barrier, USPIS requested a translator to assist with a knock and talk at the recipient's address.

16. On December 21, 2023, USPIS attempted to make contact with the addressee at the recipients address, but the addressee was not present. USPIS contacted the telephone number that was listed on the SUBJECT PARCEL (626-366-5666) and spoke with a person who identified himself as Yanwei Dong. Dong denied any knowledge of the SUBJECT PARCEL and its contents. Dong would not provide consent to USPIS to open the SUBJECT PARCEL. USPIS sent the SUBJECT PARCEL to the USPIS Columbus, OH office.

17. On December 29, 2023, the SUBJECT PARCEL was received in the USPIS Columbus, OH office.

18. Based upon training and experience, USPS Money Order purchases made at numerous US Post Offices, along with the purchase amounts being kept below \$3,000 is done to avoid Funds Transaction Reports that are required by USPS on USPS Money Order purchases of \$3,000 or more. This activity is indicative of money laundering.

19. Based upon training and experience, I respectfully submit that the above information is indicative of wire fraud and money laundering activity, and that, based on the above, there is probable cause to search the SUBJECT PARCEL.

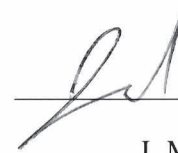
CONCLUSION

20. Based upon the foregoing facts and my training, experience, and expertise as a US Postal Inspector, I submit there is probable cause to search the SUBJECT PARCEL for money orders, and other evidence of violations of Title 18, United States Code, Sections 1343(wire

fraud) and 1956 (conspiracy to commit money laundering) located in the SUBJECT PARCEL described in Attachment A.

21. Accordingly, I respectfully request that the Court issue a search warrant, authorizing the examination of the SUBJECT PARCEL described in Attachment A to seek the items described in Attachment B.

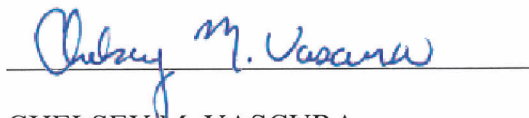
22. The above information is true and correct to the best of my knowledge, information, and belief.



J. Michael McClelland

US Postal Inspector

Sworn and subscribed to me this 4 th day of January 2024



CHELSEY M. VASCURA

United States Magistrate Judge

ATTACHMENT A**(SUBJECT PARCEL)**

United States Postal Service Priority Mail Express parcel EI501122675US, addressed to “Yanwei Dong, 402 S San Gabriel Blvd., Apt 8, San Gabriel, CA 91776”, with a return address of “Melody Liu, 501 N Henry SE, Madison, WI 53703”. This parcel is currently in the Southern District of Ohio, Eastern Division.



ATTACHMENT B

- 1.) Currency or monetary instruments, including money orders and checks
- 2.) Communications among coconspirators
- 3.) Lists of customers/victims and related identifying information
- 4.) Any lists related to U.S. Mail Parcels
- 5.) Any information relating to Subjects, including contact lists, victim lists